

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:  LIMETREE BAY SERVICES, LLC, <i>et al.</i> , <sup>1</sup>  <div style="text-align: center;">Debtors.</div>	§ § § § § § §	Chapter 11  Case No. 21-32351 (DRJ)  (Jointly Administered)
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**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL PLEADINGS**

PLEASE TAKE NOTICE that Rapp & Krock, PC (“Rapp & Krock”) and Davis Polk & Wardwell LLP (“Davis Polk”) appear as counsel for an ad hoc group of lenders (the “Terminal Lenders”) under the Terminal Entities’<sup>2</sup> prepetition secured first lien term loan facility in the above-captioned Chapter 11 cases pursuant to Rules 2002, 3017(a), 9007, 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and request that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, and orders, or other documents, filed or entered in these cases, be transmitted to:

<b>RAPP &amp; KROCK, PC</b> Henry Flores Kenneth M. Krock 1980 Post Oak Blvd. Suite 1200 Houston, TX 77056 Telephone.: (713) 759-9977 Facsimile.: (713) 759-9967 Email: <a href="mailto:hflores@rappandkrock.com">hflores@rappandkrock.com</a> Email: <a href="mailto:kkrock@rappandkrock.com">kkrock@rappandkrock.com</a>	<b>DAVIS POLK &amp; WARDWELL LLP</b> Damian S. Schaible Elliot Moskowitz Aryeh Ethan Falk Jonah A. Peppiatt 450 Lexington Avenue New York, NY 10017 Telephone: (212) 450-4000 Facsimile: (212) 701-5800 Email: <a href="mailto:damian.schaible@davispolk.com">damian.schaible@davispolk.com</a>
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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors’ federal tax identification number, as applicable, are: Limetree Bay Services, LLC (1866); Limetree Bay Refining Holdings, LLC (1776); Limetree Bay Refining Holdings II, LLC (1815); Limetree Bay Refining, LLC (8671); Limetree Bay Refining Operating, LLC (9067); Limetree Bay Refining Marketing, LLC (9222). The Debtors’ mailing address is Limetree Bay Services, LLC, 11100 Brittmoore Park Drive, Houston, TX 77041.

<sup>2</sup> The Terminal Entities are: Limetree Bay Terminals, LLC, Limetree Bay Terminal Holdings, LLC, Limetree Bay Terminal Holdings II, LLC, and Limetree Bay Cayman, Ltd.

	Email: <a href="mailto:elliott.moskowitz@davispolk.com">elliott.moskowitz@davispolk.com</a> Email: <a href="mailto:aryeh.falk@davispolk.com">aryeh.falk@davispolk.com</a> Email: <a href="mailto:jonah.peppiatt@davispolk.com">jonah.peppiatt@davispolk.com</a>
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**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Rules and title 11 of the United States Code (the “Bankruptcy Code”), but also includes orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise filed with regard to the above case.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of the Terminal Lenders to (a) have final orders in non-core matters entered only after de novo review by a District Court judge, (b) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (c) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (d) any other rights, claims, actions, defenses, setoffs or recoupments, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

DATED: July13, 2021

Respectfully submitted,

**RAPP & KROCK, PC**

By: /s/ Henry Flores  
Henry Flores  
Texas State Bar No. 00784062  
Kenneth M. Krock  
Texas State Bar No. 00796908  
1980 Post Oak Blvd. Suite 1200  
Houston, TX 77056  
Telephone.: (713) 759-9977  
Facsimile.: (713) 759-9967  
Email: hflores@rappandkrock.com

-and-

**DAVIS POLK & WARDWELL LLP**  
Damian S. Schaible (*pro hac vice* pending)  
Elliot Moskowitz (*pro hac vice* pending)  
Aryeh Ethan Falk (*pro hac vice* pending)  
Jonah A. Peppiatt (*pro hac vice* pending)  
450 Lexington Avenue  
New York, NY 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Email: damian.schaible@davispolk.com  
Email: elliot.moskowitz@davispolk.com  
Email: aryeh.falk@davispolk.com  
Email: jonah.peppiatt@davispolk.com

**COUNSEL FOR THE TERMINAL LENDERS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served by electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case on July 13, 2021.

/s/ Henry Flores  
Henry Flores